

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

TAYLOR DUKE
on behalf of herself and
similarly situated employees,

Plaintiff,

V.

**HARVEST HOSPITALITIES, INC.,
AND SATTAR SHAIK,**

Defendants.

JOINT MOTION FOR ONE-WEEK EXTENSION
OF TIME TO FILE MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT

AND NOW come Plaintiffs and Defendants, through their respective counsel, and hereby file this joint motion for one-week extension of time for Plaintiffs to file Plaintiffs' Motion for Preliminary Approval of Class Action Settlement in this action.

Per this Court's Order of May 31, 2022, Plaintiffs shall file their Motion for Preliminary Approval of Class Action Settlement on or before June 21, 2022. (ECF No. 138.) The Parties have worked diligently to finalize the agreement and related papers. In the process of finalizing the agreements, the Parties discovered that the time record dataset on which the Parties will rely in calculating allocations made pursuant to the Settlement Agreement requires a manual removal of assistant manager and manager shifts. This manual removal needs to be completed before the Parties can complete one of the schedules that Plaintiffs' will attach to the motion for class certification.

Accordingly, the Parties request a short extension so that the Parties can complete this manual removal of assistant manager and manager shifts.

WHEREFORE, the Parties respectfully request the Court enter an order extending the deadline for Plaintiffs to file their Motion for Preliminary Approval of Class Action Settlement to June 28, 2022.

* * * * *

A proposed order is submitted herewith.

Dated: June 21, 2022
Pittsburgh, PA

Respectfully submitted,

/s/ Joseph H. Chivers

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